



The Best Of Everything™

June 10, 2016

Chad Segress
President/Assistant General Manager
Terral Telephone Company
9802 N. Morgan Road
Yukon, OK 73099

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT:

Connect America Fund; High Cost Universal
Service Support IN WC DOCKET NOS. 10-90, 07-
135, 05-337, 03-109, CC DOCKET NOS. 01-92,
96-45, GN DOCKET NO. 09-51, WT DOCKET NO.
10-208, BEFORE THE FEDERAL
COMMUNICATIONS COMMISSION

Dear Ms. Dortch:

Please find attached with this letter a request for confidential treatment for portions of information submitted with our company Form 481. Two copies of the redacted Form 481, with redacted attachments, filed on behalf of our company. Contemporaneously, we are filing two copies of the redacted Form 481, with redacted attachments, filed on behalf of our company. An un-redacted copy, stamped confidential, has been sent to the Secretary's office. This information has also been filed with our state commission and electronically submitted, and certified, with the Universal Service Administration Company. If you have any questions or concerns with the attachments, please contact Charles Curtis at Charles.curtis@contaegis.com or by phone at 252-514-2203.

Sincerely,



Chad Segress

Cc: file

REDACTED – FOR PUBLIC INSPECTION

TERRAL TELEPHONE COMPANY, 111 HARRISON AVE., LL-001, OKLAHOMA CITY, OK 73104-1816

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
Connect America Fund)	WC Docket No. 10-90
)	WC Docket No. 07-135
High-Cost Universal Service Support)	WC Docket No. 11-42
)	WC Docket No. 05-337
Lifeline and Link Up Reform)	WC Docket No. 03-109
)	CC Docket No. 01-92
)	CC Docket No. 96-45
)	GN Docket No. 09-51
)	WT Docket No. 10-208

REQUEST FOR CONFIDENTIAL TREATMENT

Terral Telephone Company ("Filer") requests that the portions of its Form 481 pertaining to its Five Year Plan in the Service Quality Improvement Reporting, its Tribal Land Offerings documentation and its Rate of Return Additional Documentation (RUS Annual Report) be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. Sections 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. Section 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the Filer's capital expenditure budgets, detailed network information, corporate affiliations, strategic service offerings with Tribal Governments as well as sensitive financial information filed in the Rate of Return Documentation. Release of such information would supply its competition sensitive commercial information that would undermine its ability to serve its customers effectively. Such information is not customarily disclosed to the public or made available within the telecommunications industry. Therefore, the Filer requests confidentiality of these respective portions of its Form 481 filing be granted. Support for the Filer's request for confidential treatment pursuant to FCC rules in Section 0.459(b) is provided as follows:

I. FILER'S FORM 481 SATISFY THE REQUIREMENTS OF SECTION 0.459 OF THE COMMISSION'S RULES

The material the Filer seeks confidentiality qualifies for the requirements outlined in Section 0.459 of the FCC's rules. As will be demonstrated, the Filer has satisfied all the elements of this section, concluding that disclosure of this information would be harmful to the Filer.

(1) Identification of the specific information for which confidential treatment is sought.

The Filer requests confidential treatment for the portions of the Form 481 required by 47 C.F.R. Section 54.313(a)(2) and (4). The Form bears the legend "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NO.'S 10-90, 07-135, 05-337, 03-109, CC DOCKETS 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATION COMMISSION." The specific information considered confidential include: 1) The Filer's 5 year capital budget and network information associated with Service Quality Improvement Reporting (100), 2) Tribal Land Offerings documentation (900) and 3) ROR Additional Documentation which represents financial reports for calendar year 2015 (3005).

- (2) **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** The information is required to be produced annually in accordance with 47 C.F.R. Section 54.313(a). The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42.
- (3) **Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The information requested for confidential treatment is information not customarily released to the public. Release of this information would have the effect of substantial harm to the competitive position of the Filer.
- (4) **Explanation of the degree to which the information concerns a service that is subject to competition.** All of the services provided by the Filer are subject to competition.
- (5) **Explanation of how disclosure of the information could result in substantial competitive harm.** Identification of network details could enable wrongdoers the ability to compromise network reliability to customers. In addition, competitive entities in the Filer's area would have access to sensitive network, strategic and financial details that would hamper the Filer's ability to effectively compete.
- (6) **Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The information filed is not customarily released to the public or publically made available within the telecommunications industry. The information is also only released within internal circulation, including its attorneys, consultants and engineers, held to confidentiality agreements. The request as well as the associated documents subject to it, are filed both paper copy as well as electronically.
- (7) **Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** None of the information requesting confidential treatment is available to the public and have not been disclosed to parties unless those parties are engaged to perform services for the Filer, under non-disclosure.
- (8) **Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** Due to the fact that the nature of the information being filed is sensitive in terms of competitive and public safety concerns, the Filer requests that confidential treatment be granted indefinitely.

II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's rules, the Filer requests that the portions of Form 481 relating to those particular items listed in I.1, above, be treated as confidential under the Commission's rules and precedent and withheld from public inspection and that any distribution of them within the Commission should be limited, in accordance with the reasons stated for confidential request. In the case where any person, party or entity wishes to access any of this information, the Filer requests immediate notification so it can have the opportunity to oppose the request or consider any other action it deems necessary to protect both its network, strategic and financial interests and the interest of the customers it continues to serve.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Chad Segress', is written over a horizontal line.

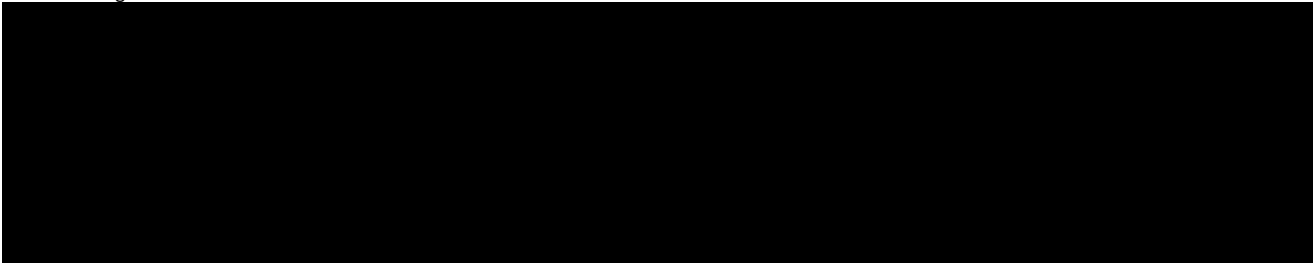
Chad Segress
President/Assistant General Manager
Terral Telephone Company
9802 N. Morgan Road
Yukon, OK 73099
405-842-1764

June 10, 2016

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

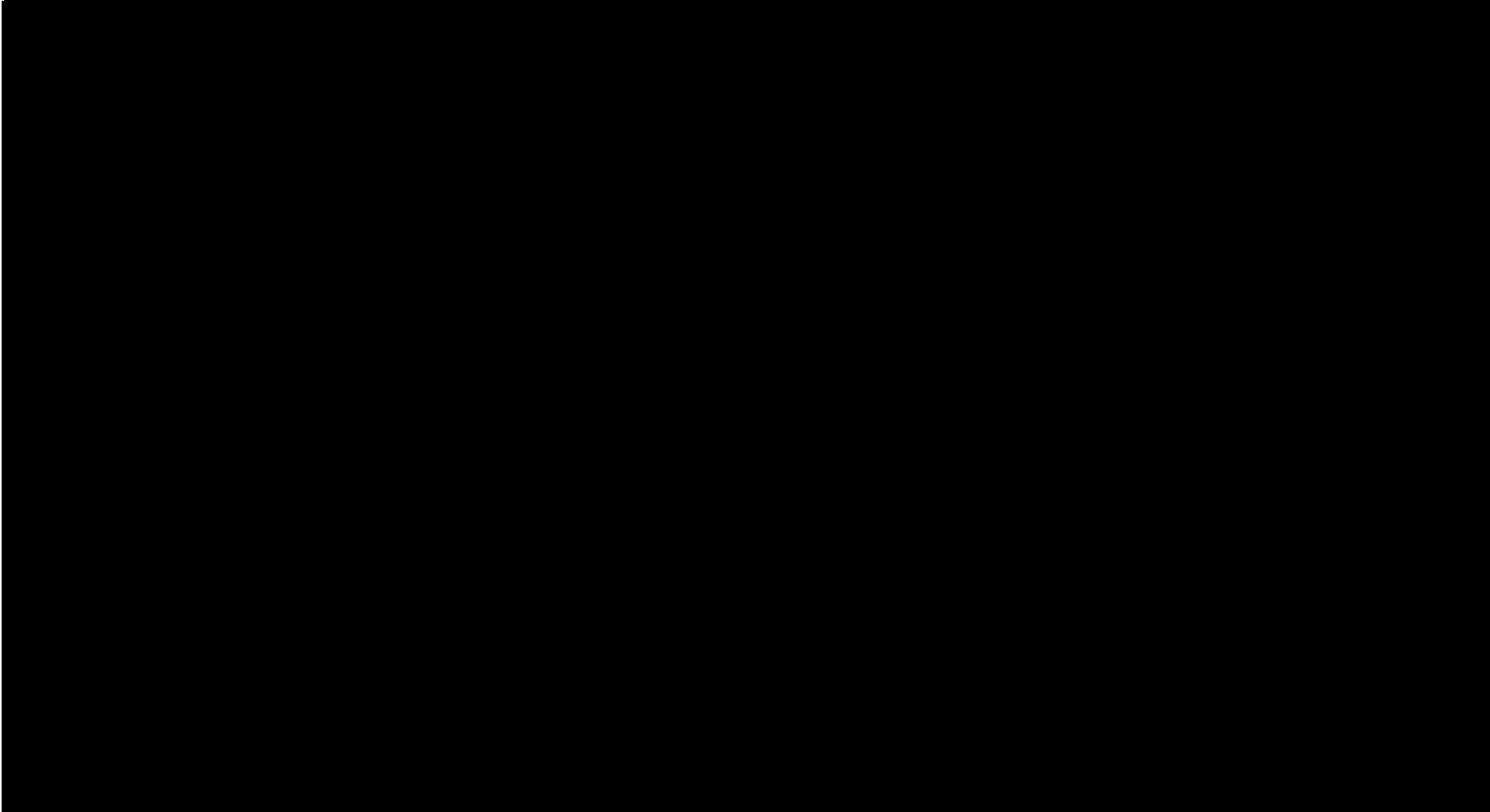
<010> Study Area Code	432029
<015> Study Area Name	TERRAL TEL CO
<020> Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

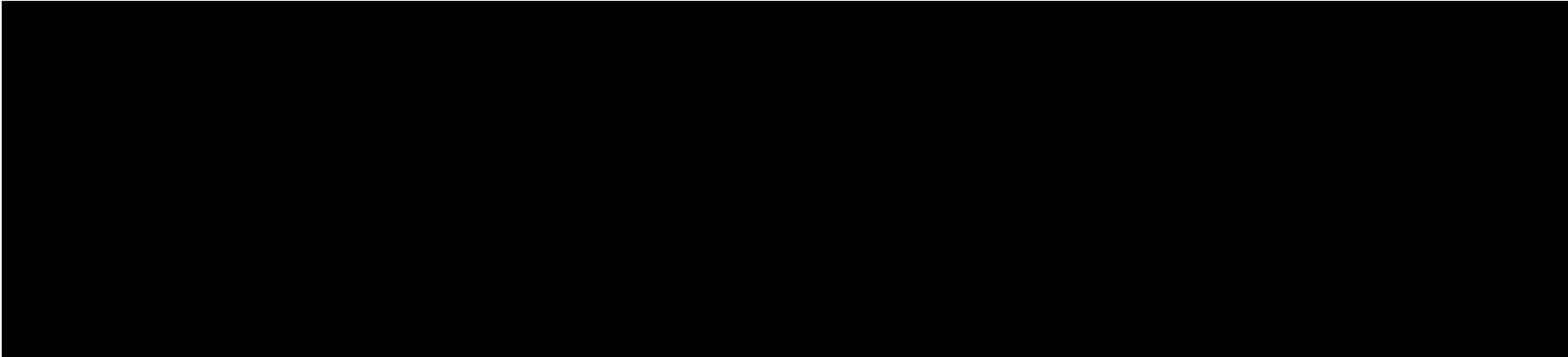
<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017

REDACTED-FOR PUBLIC INSPECTION

(300) Unfulfilled Service Request
Data Collection Form

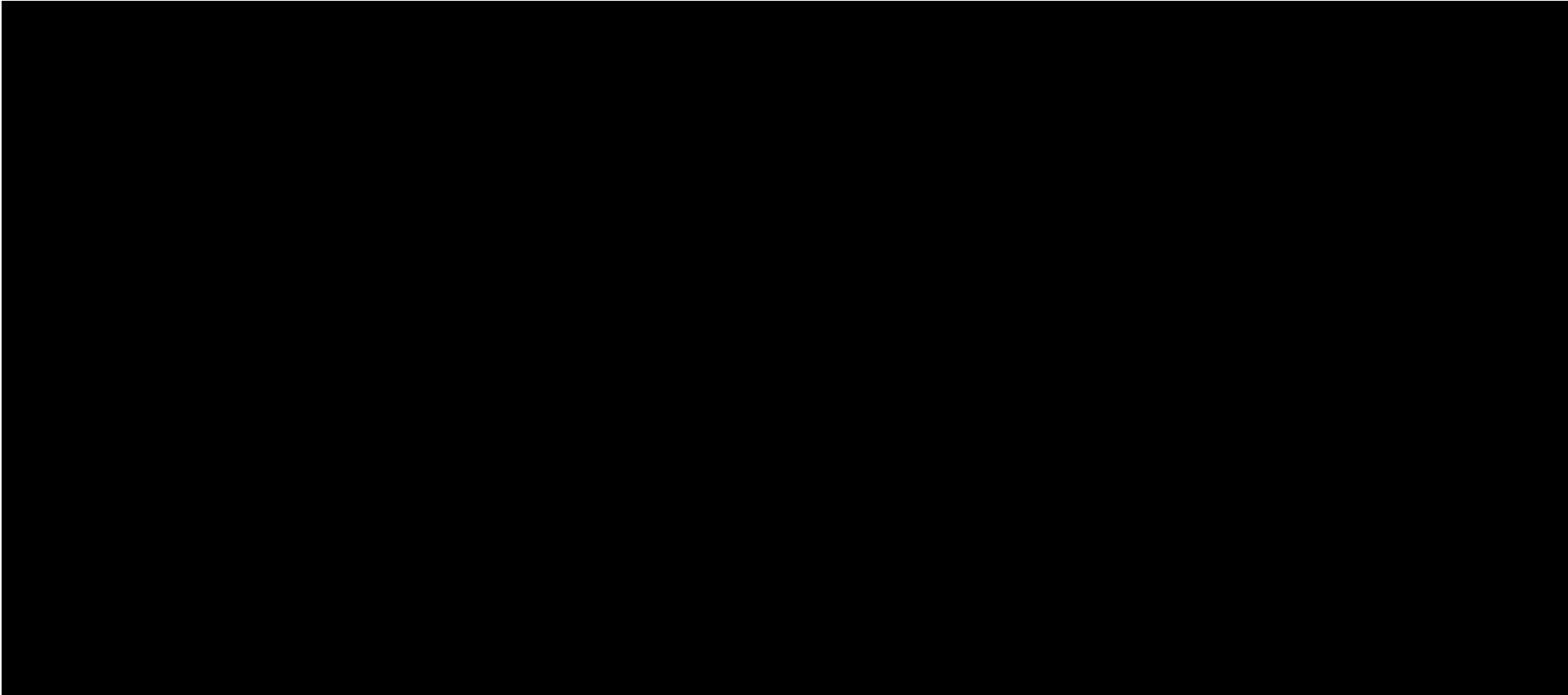
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
		2017



REDACTED-FOR PUBLIC INSPECTION

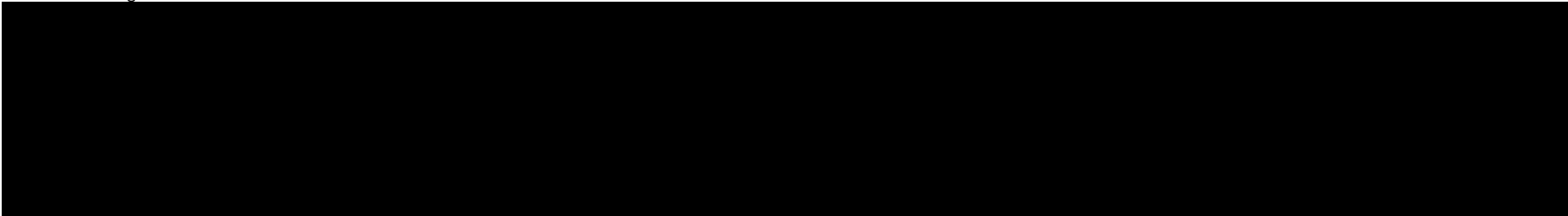
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<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017

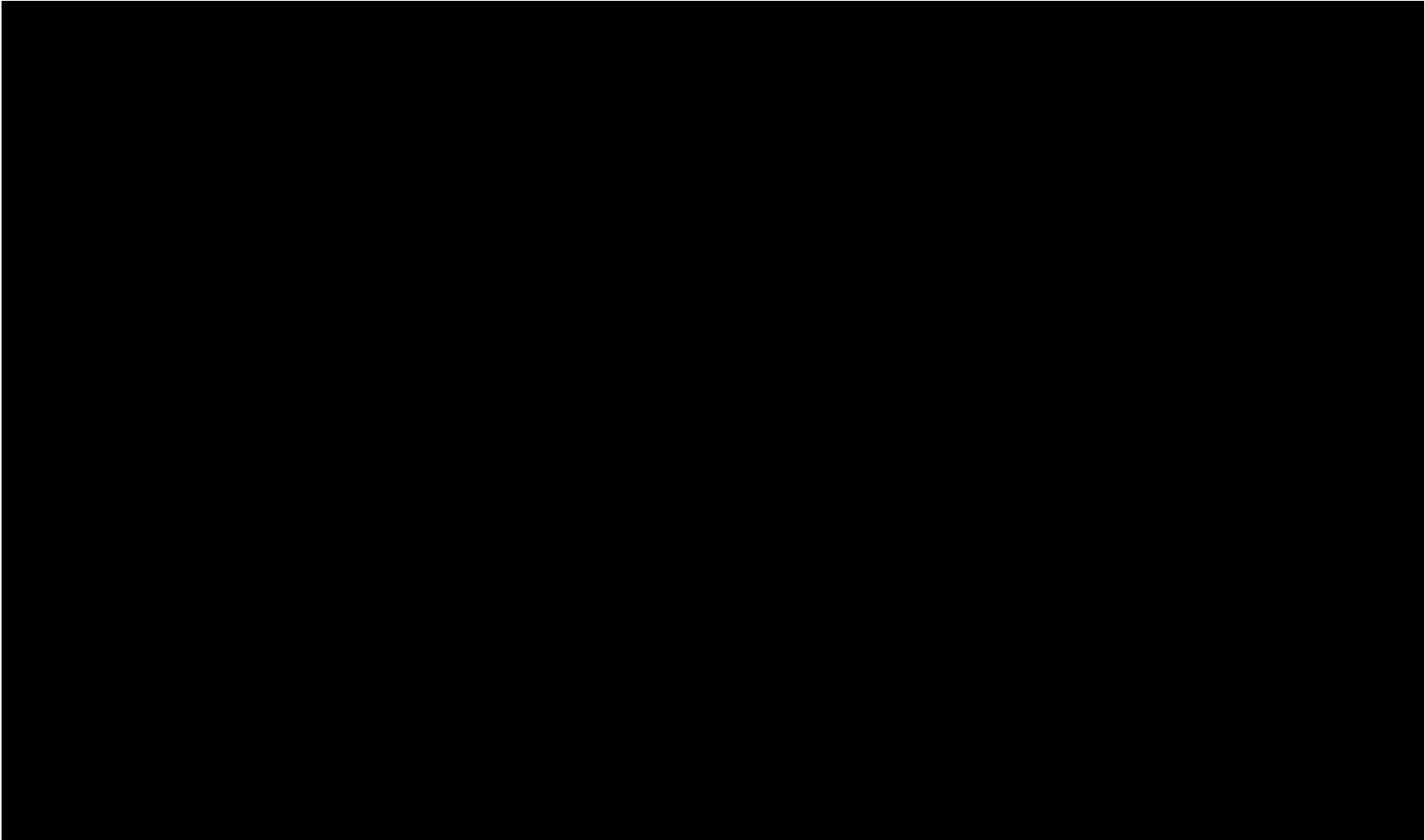


REDACTED-FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
		2017

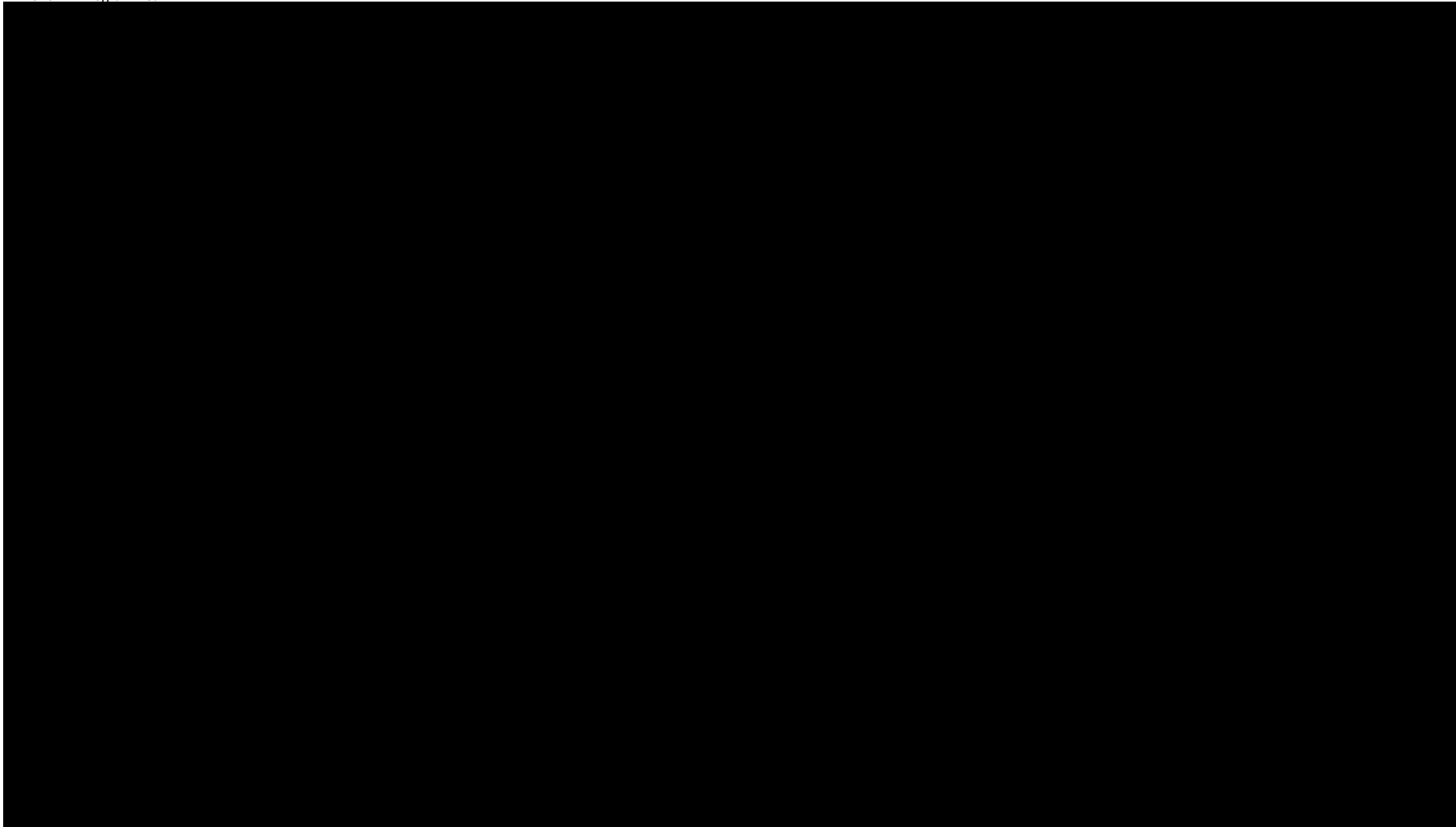


REDACTED-FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

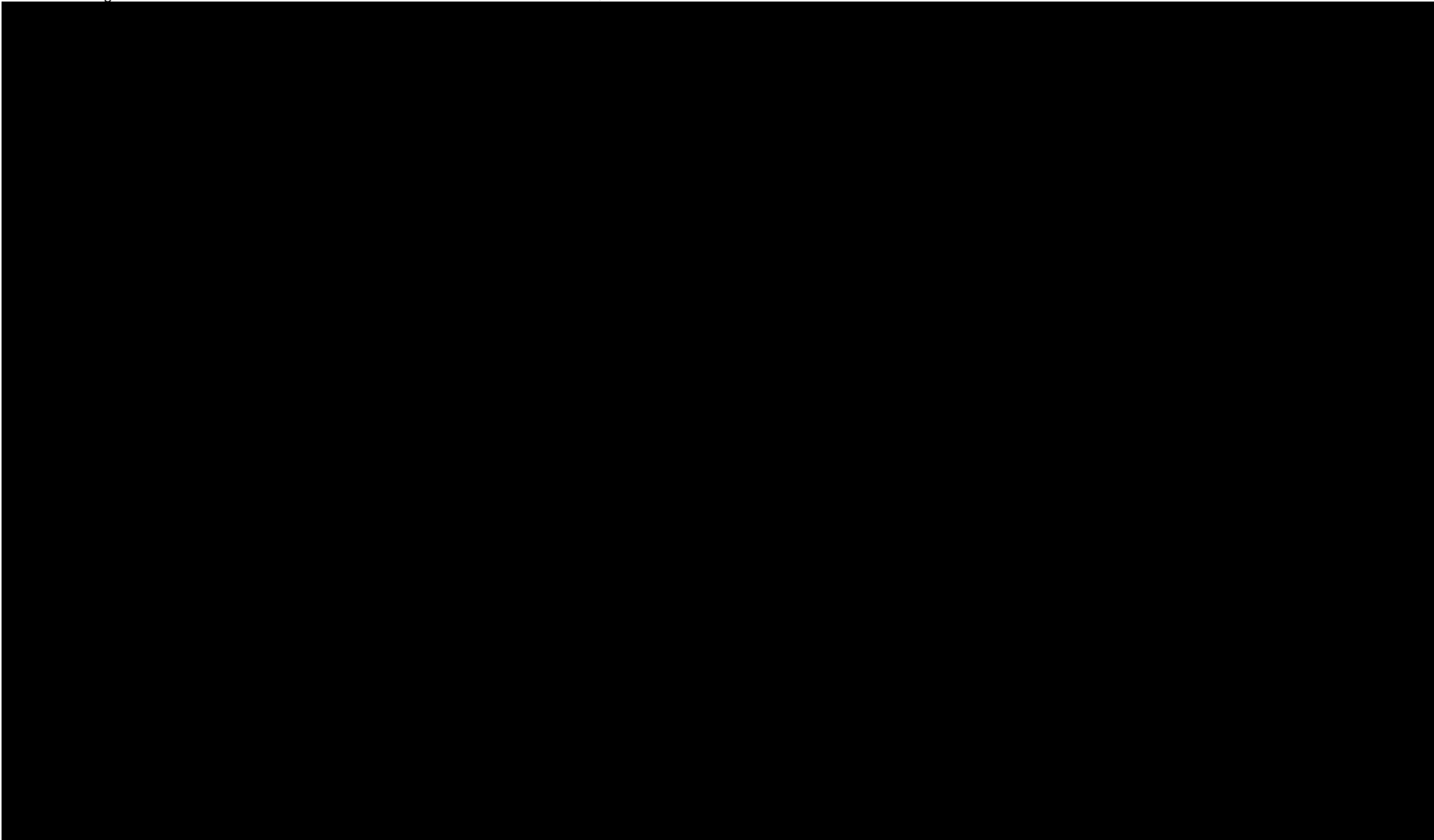
(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 432029

<015> Study Area Name TERRAL TEL CO

<020> Program Year 2017



REDACTED-FOR PUBLIC INSPECTION

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

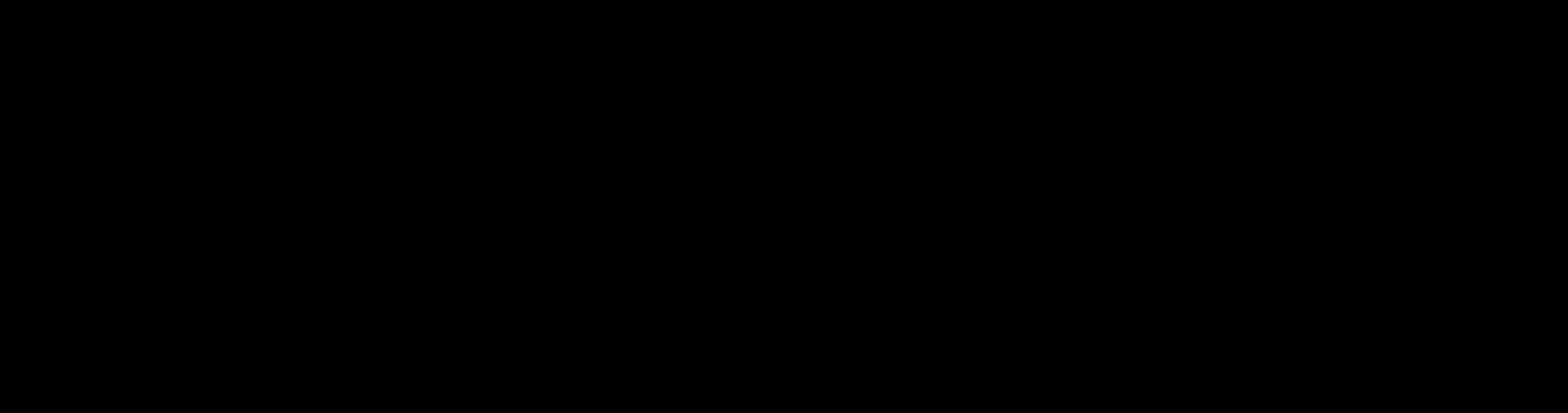
July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017

REDACTED-FOR PUBLIC INSPECTION

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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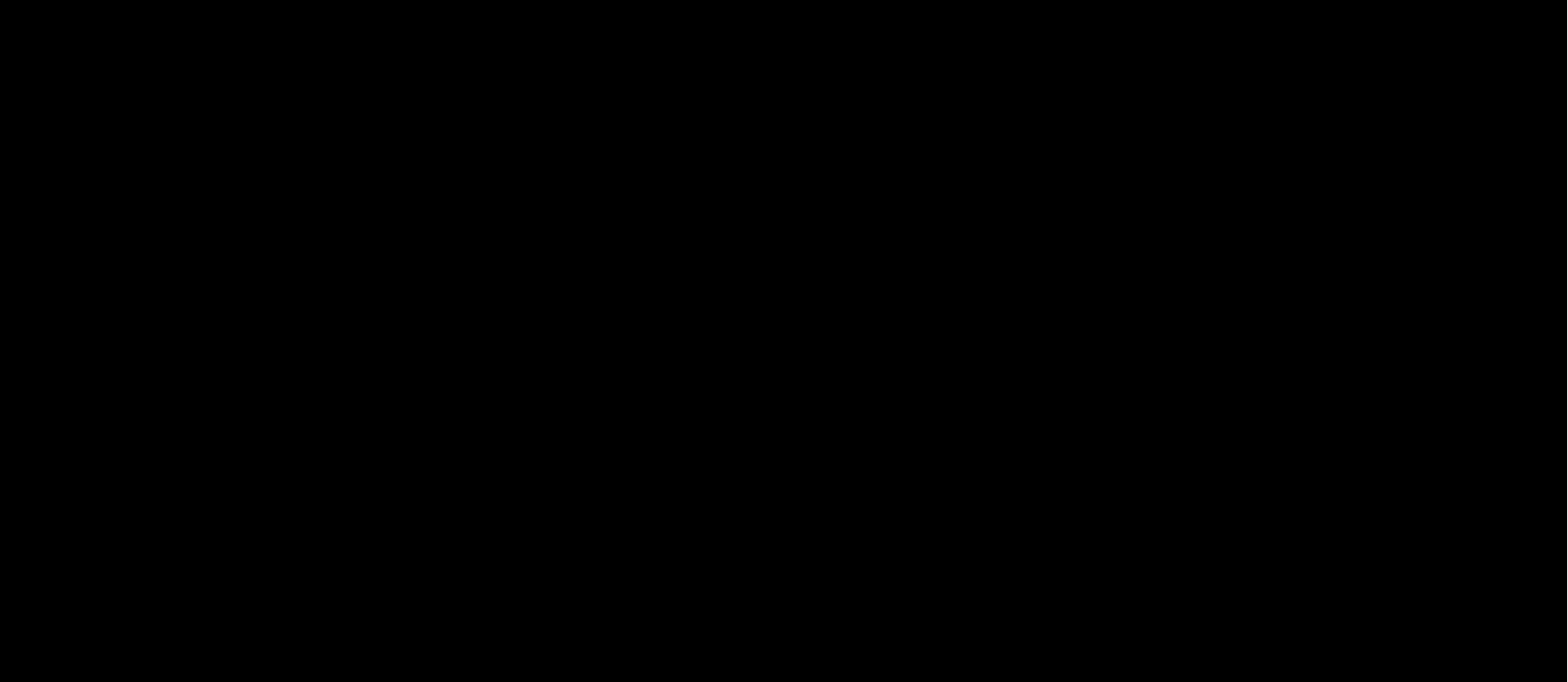
<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form	July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

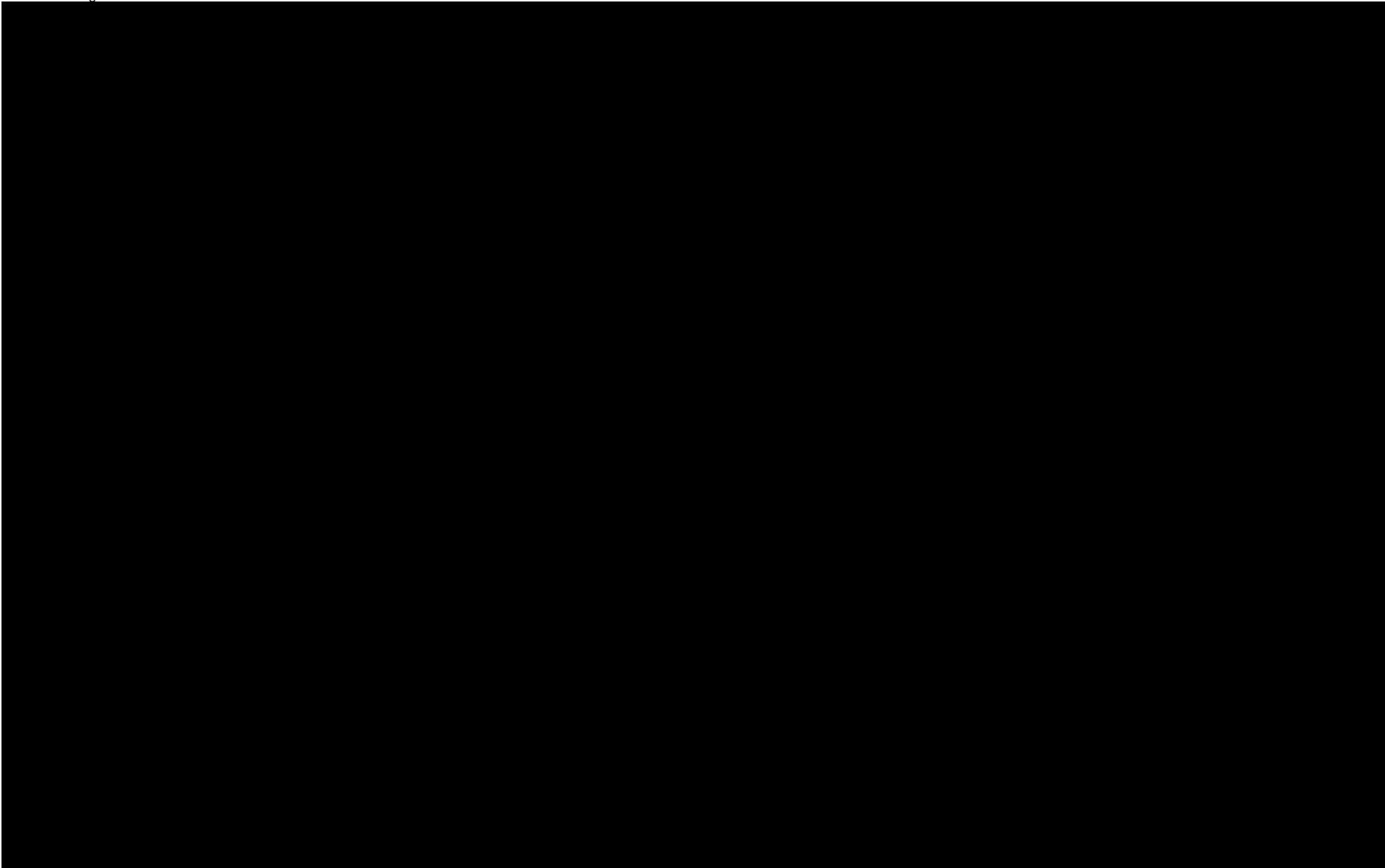
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



REDACTED-FOR PUBLIC INSPECTION

(2000) Price Cap Carrier Additional Documentation (Continued)

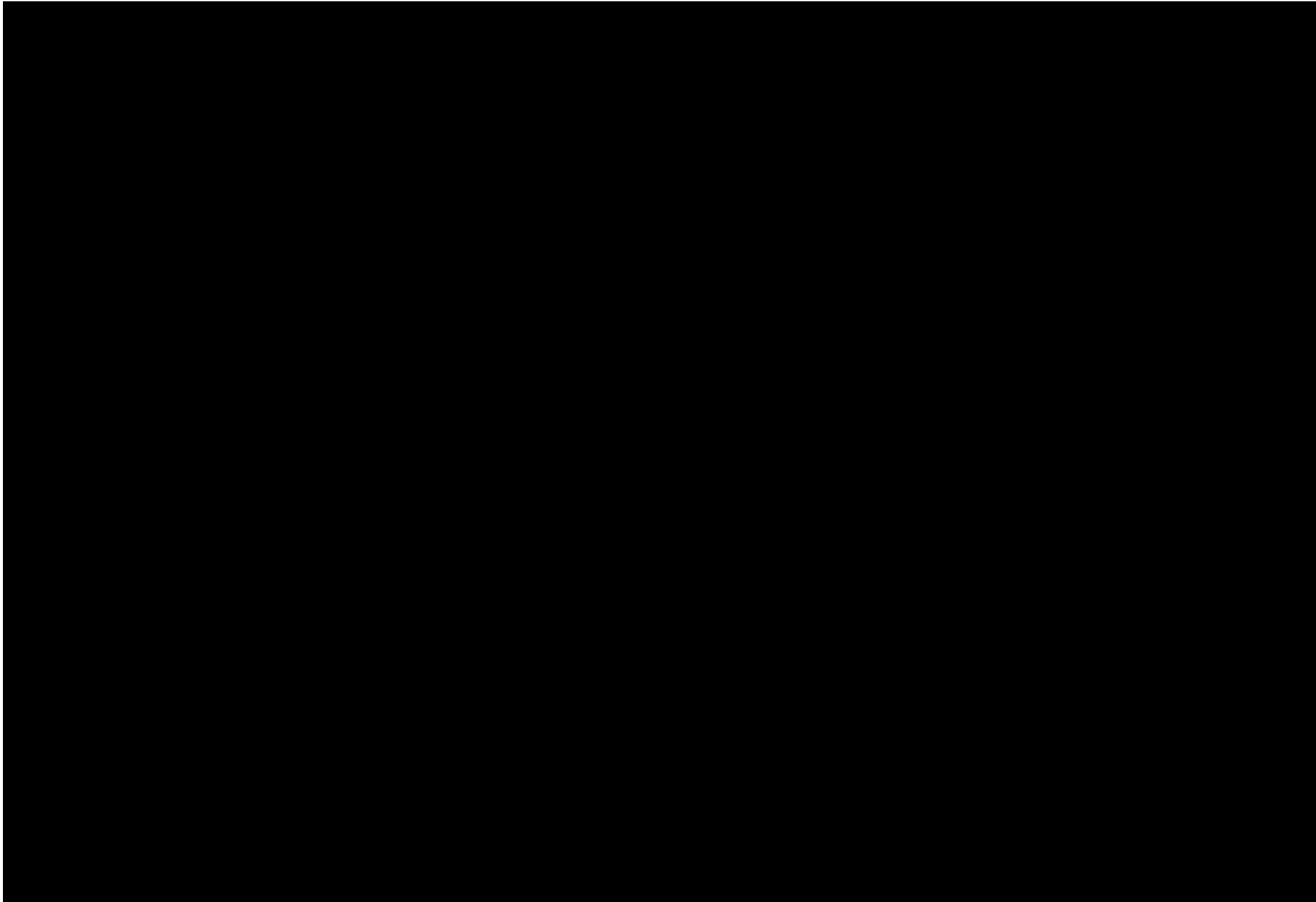
Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

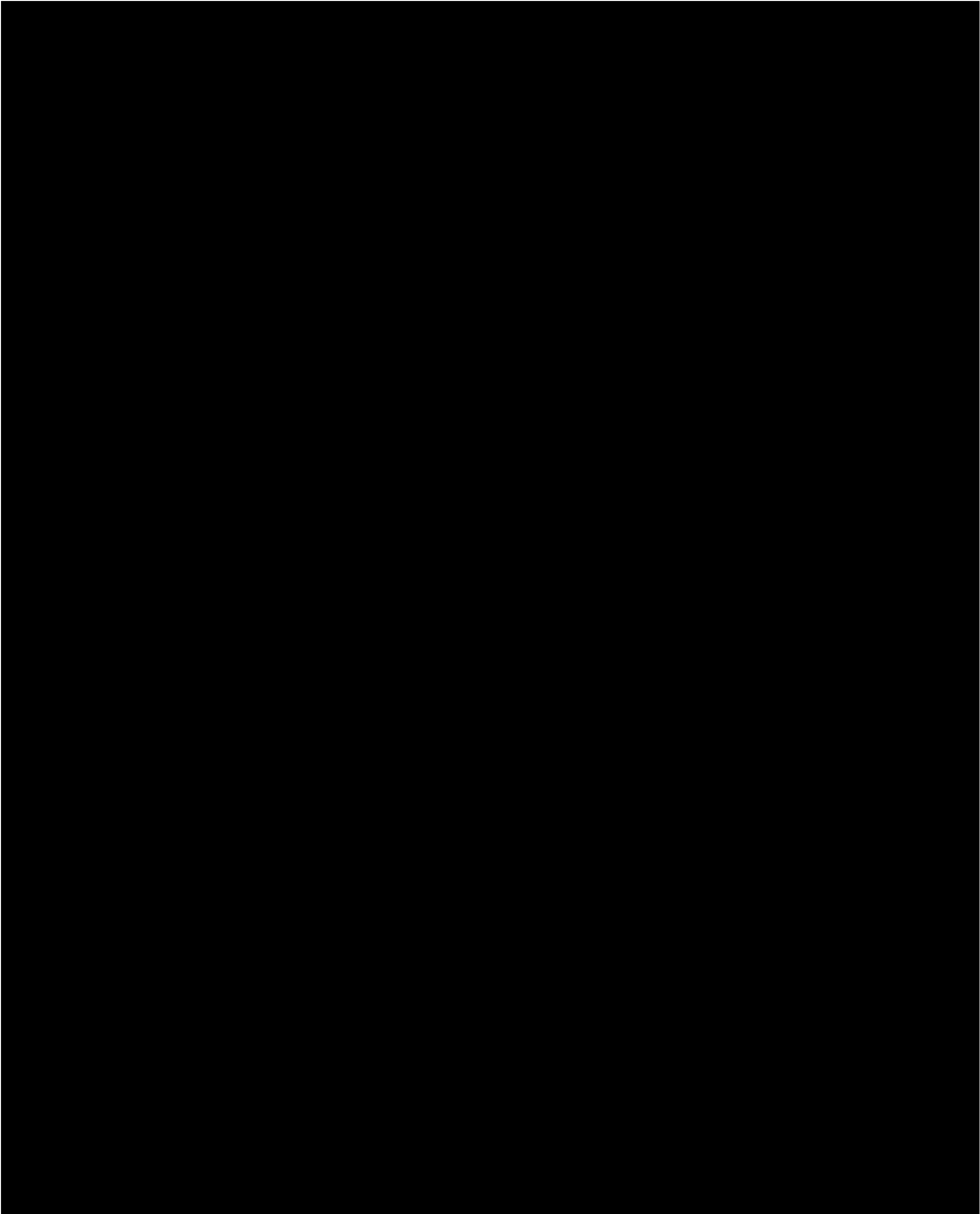
FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013



<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



(3005) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

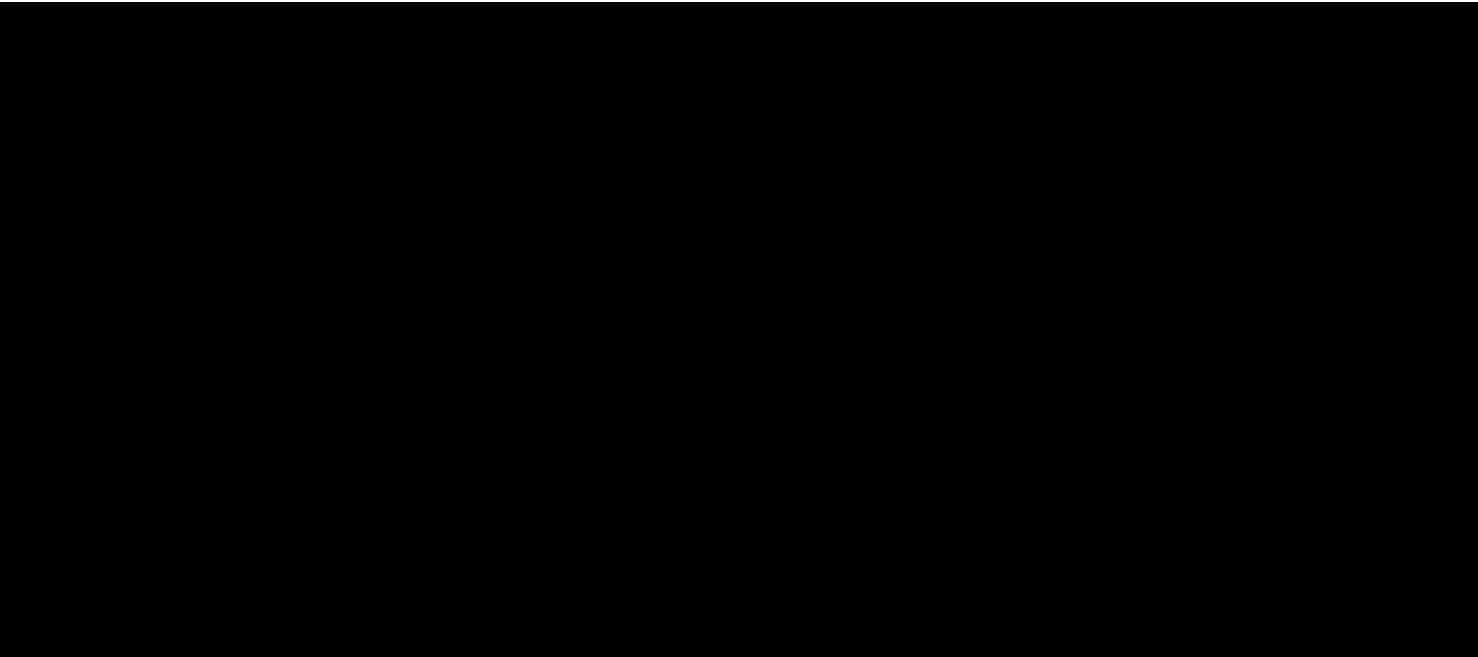
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432029

<015> Study Area Name

TERRAL TEL CO

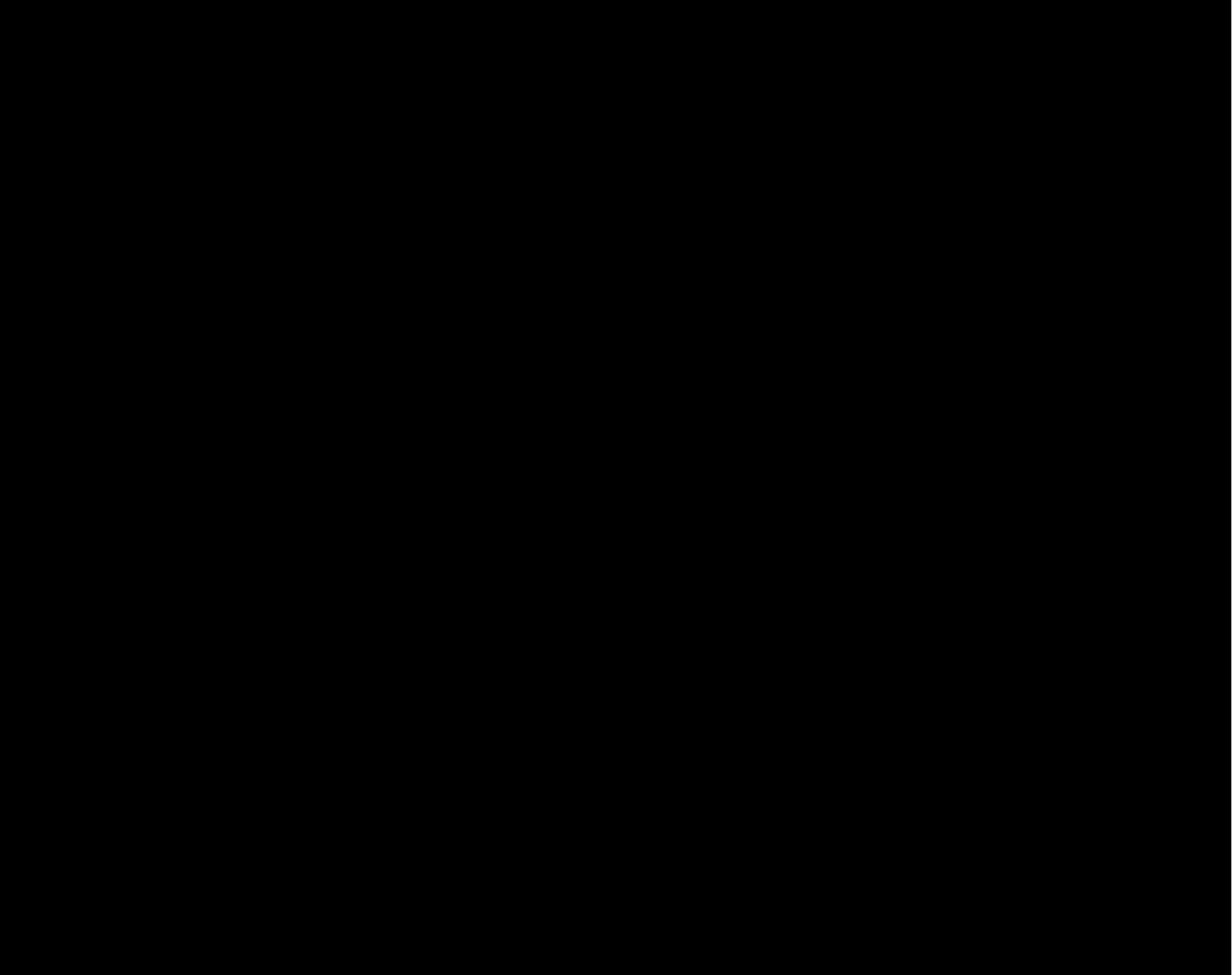
2017



Name of Attached Document Listing Required Information

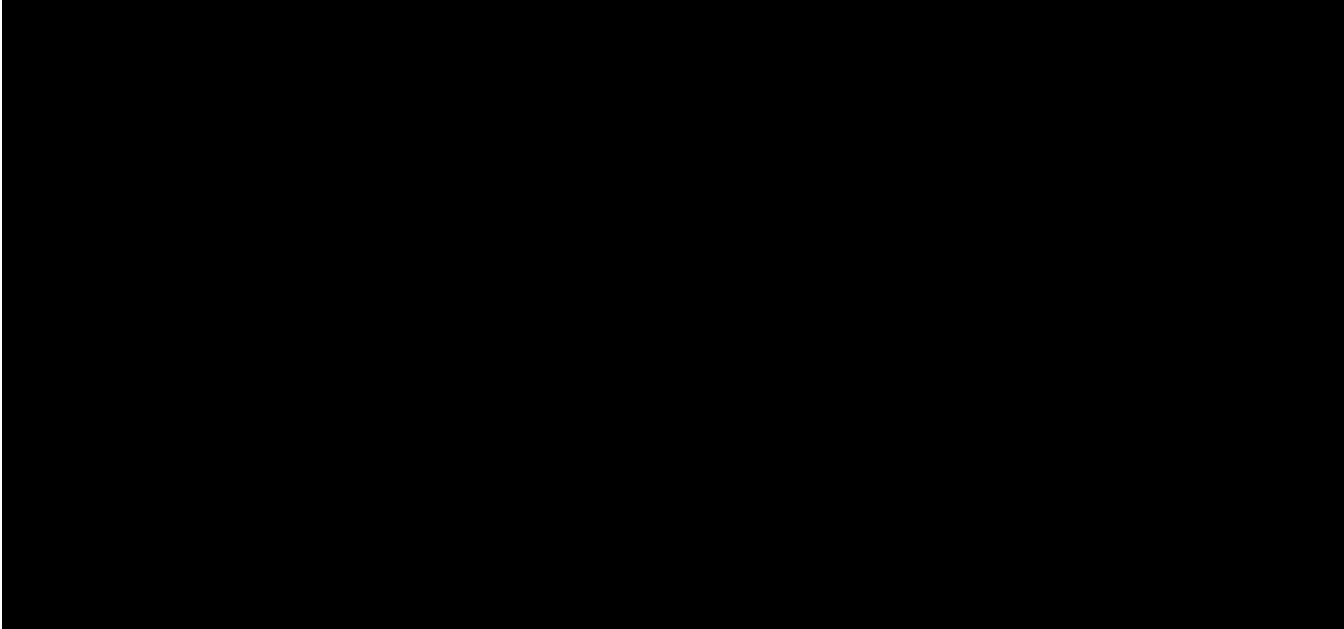
REDACTED-FOR PUBLIC INSPECTION

<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



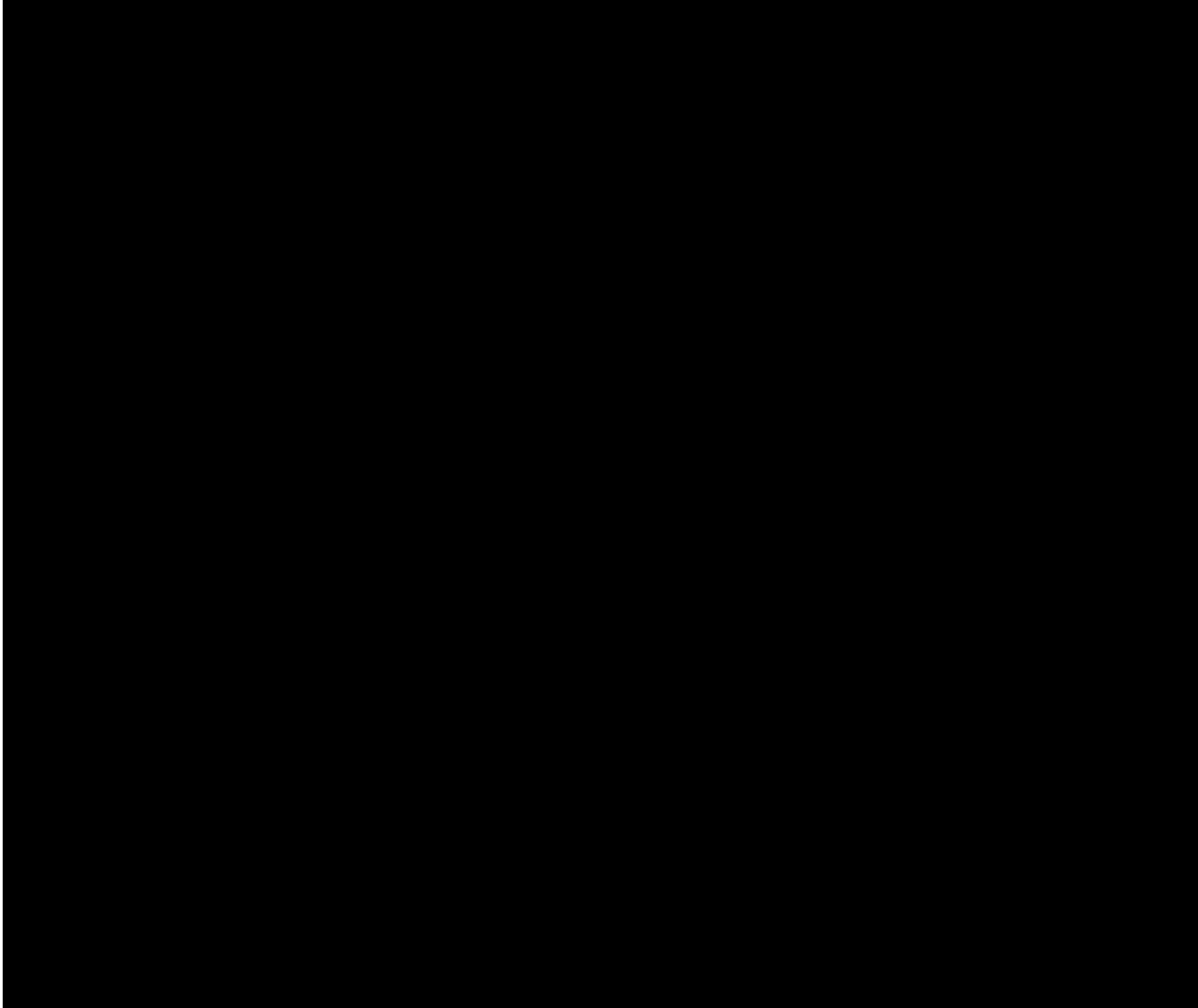
Certification - Reporting Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
		2017



Attachments

REDACTED-FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code

432029

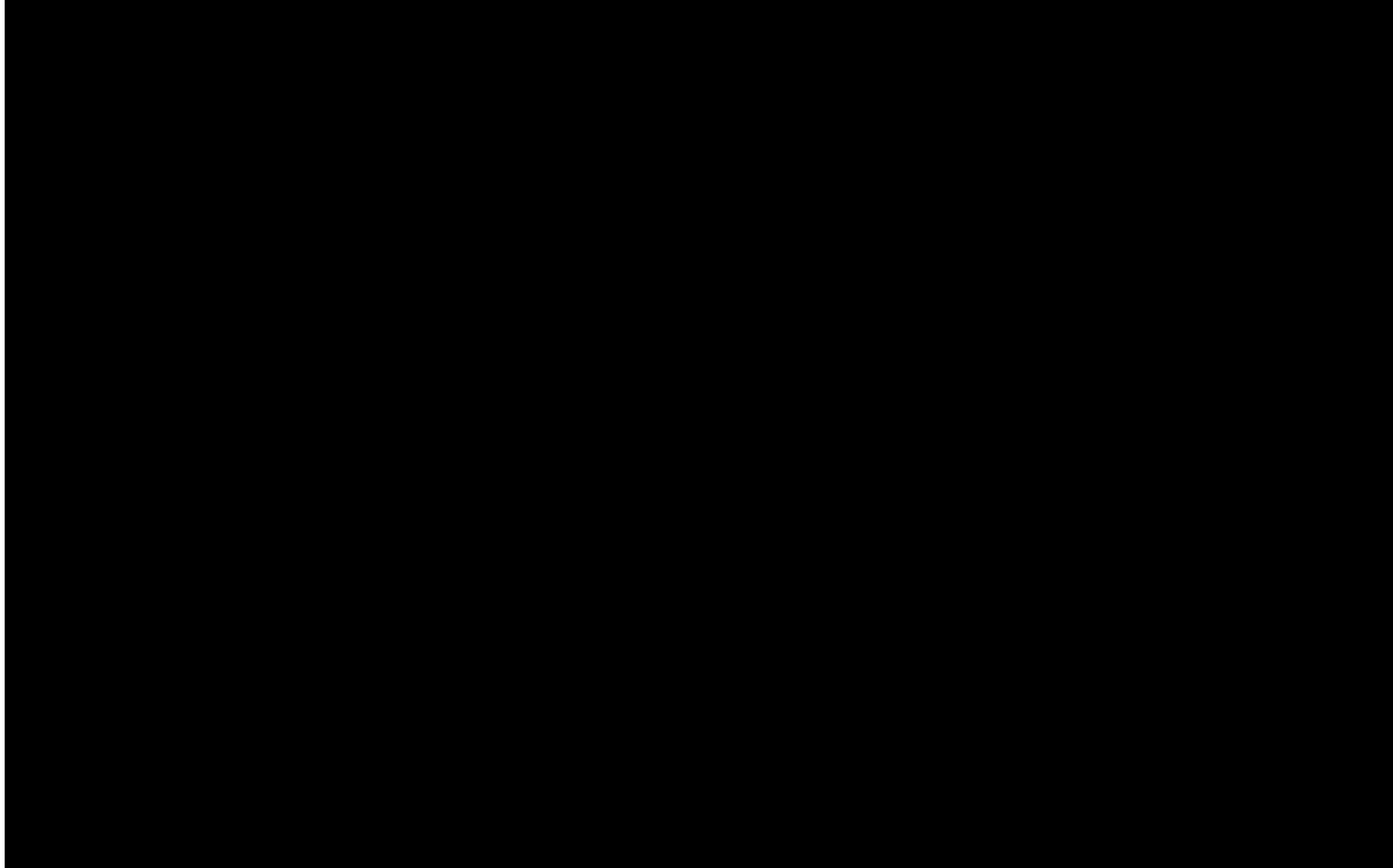
<015> Study Area Name

TERRAL TEL CO

2017



<010>	Study Area Code	432029
<015>	Study Area Name	TERRAL TEL CO
<020>	Program Year	2017



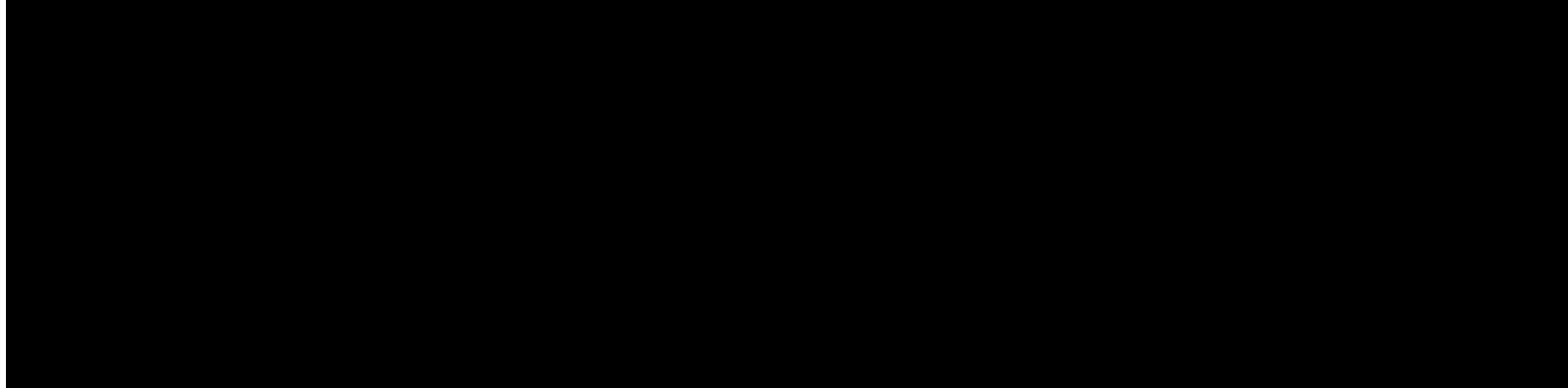
COMPANY	TERRAL TELEPHONE COMPANY
SAC	432029
YEAR COMPLETED	2016

CLLI

Square Miles

Population

Growth



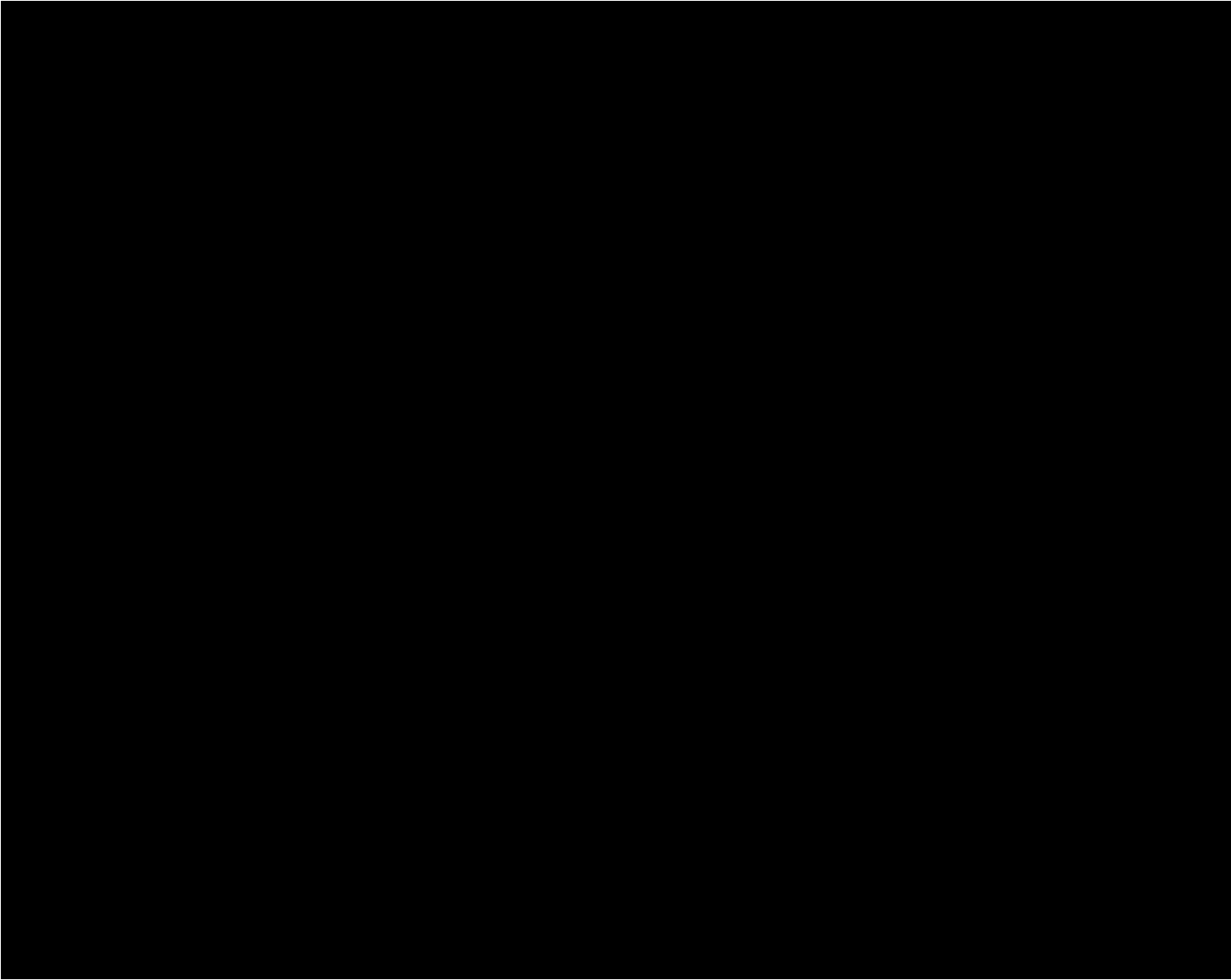
REDACTED-FOR PUBLIC INSPECTION

SAC

432029

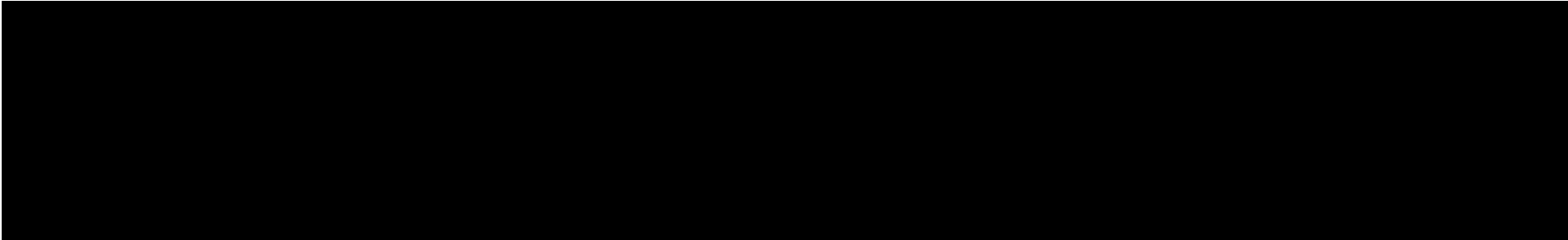
YEAR FILED

2016



SAC
WIRE CENTER
YEAR FILED

432029
TRRLOK
2016



REDACTED-FOR PUBLIC INSPECTION

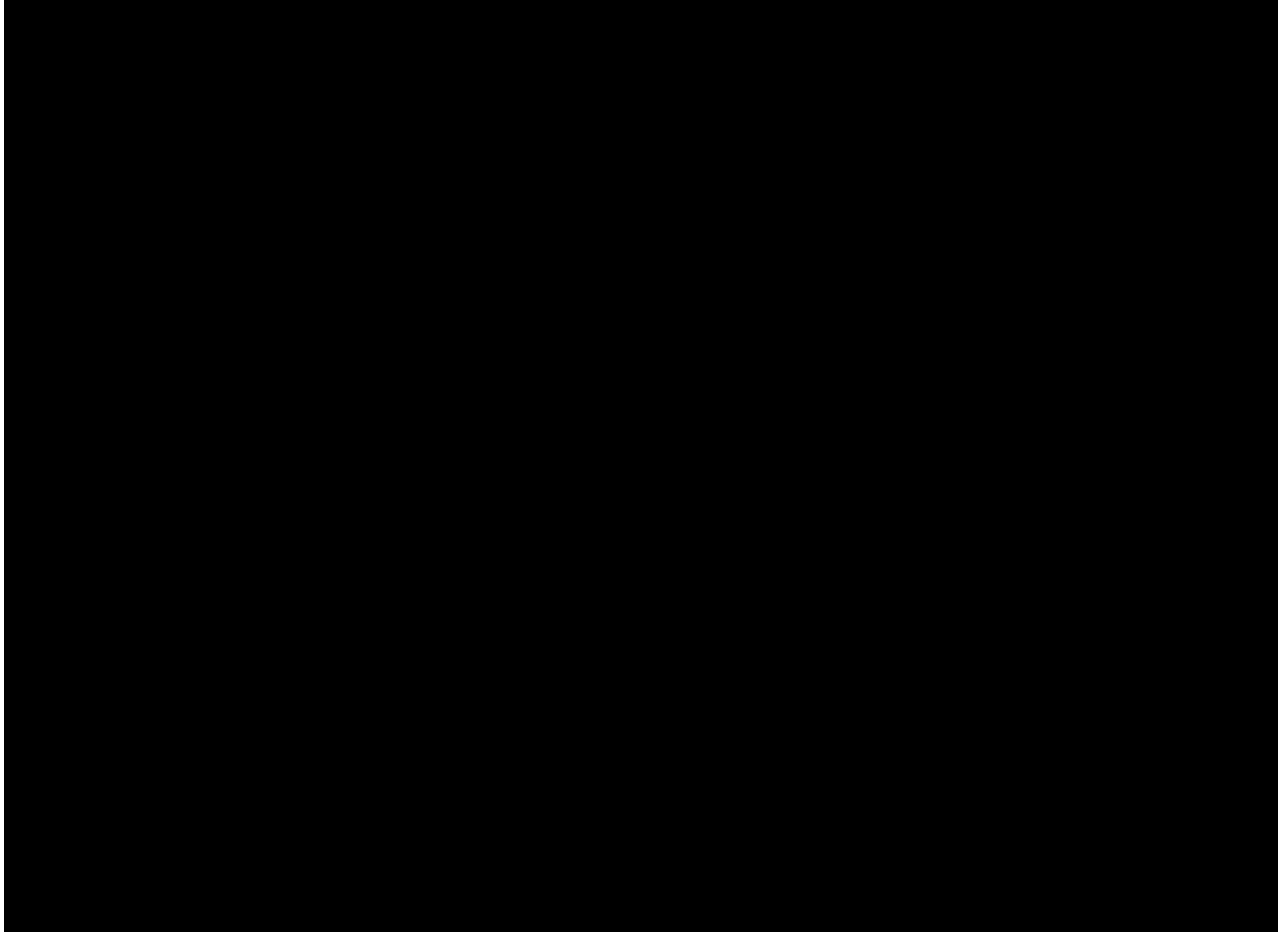
REDACTED-FOR PUBLIC INSPECTION

REDACTED-FOR PUBLIC INSPECTION

Terral Telephone Company

Study Area Code: 432029

Response to Line 510 – Service Quality Standards and Consumer Protection Rules

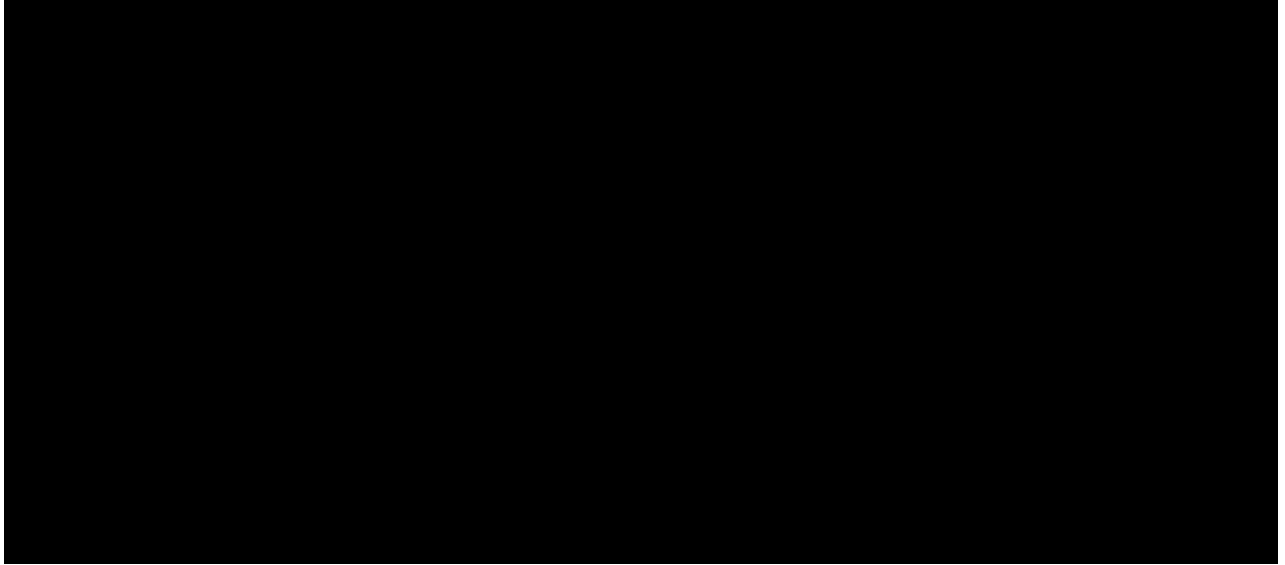


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Terral Telephone Company

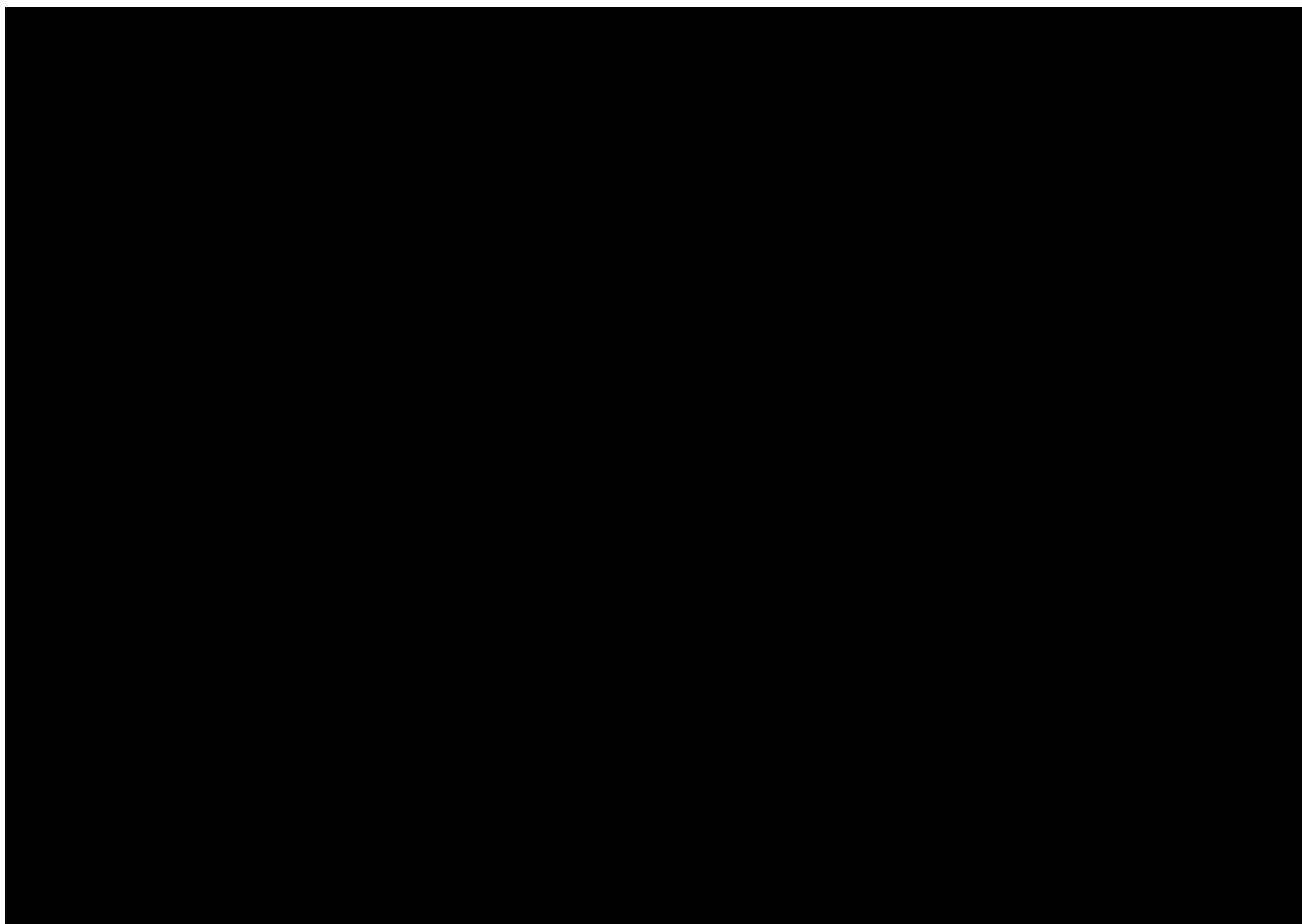
Study Area Code: 432029

Response to Line 610 – Ability to Function in Emergency Situations for Voice and Broadband



¹ Section 54.202(a)(2)

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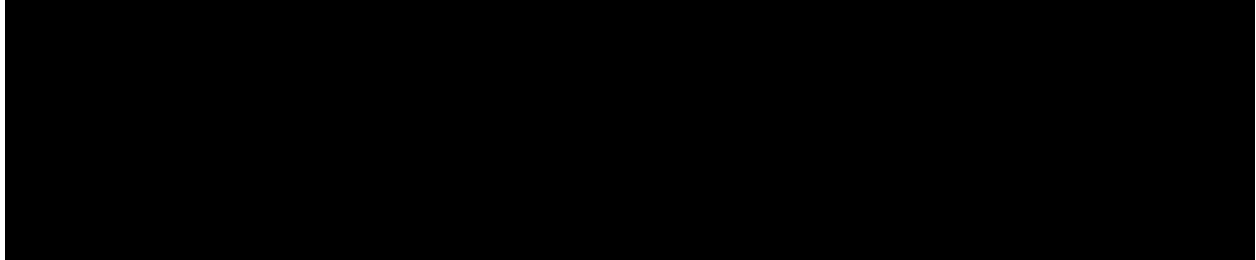


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Terral Telephone Company

Study Area Code: 432029

Response to Line 1010 – Voice Services Rate Comparability



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LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

C. Eligibility Requirements (Continued)

- a. The applicant or customer must meet the requirements for eligibility for either Medicaid, Food Stamps, federal public housing, Low-Income Energy Assistance Program, or Supplemental Security Income. Additionally, persons who are eligible recipients of income assistance for Vocational Rehabilitation (including Aid to the Hearing Impaired) are also eligible for the Lifeline Service credit; or
 - b. Are eligible for or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under programs providing vocational rehabilitation, including aid to the hearing impaired; or
 - c. Are eligible for or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant, pursuant to the Sales Tax Relief Act, section 5011 et seq. of Title 68 of the Oklahoma Statutes.
 - d. For federal income tax purposes, the applicant is not a dependant unless over sixty years of age.
2. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
 3. Upon receipt of the applicant's documentation establishing eligibility as stated above, the Company will begin providing the credit.
 4. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually.
 5. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

APPROVED

JAN 01 1998

Cause Nos. PUD 970000542; PUD 970000565

Order No. 419103

Effective: 1-1-98

DIRECTOR OF

PUBLIC UTILITIES

REDACTED-FOR PUBLIC INSPECTION

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

D. Lifeline Credits

Monthly Credit (1)

- | | | |
|----|--|--------|
| 1) | federal subscriber line charge credit | (2) |
| 2) | initial federal credit to residential access line | \$1.75 |
| 3) | initial state credit to residential access line | \$1.17 |
| 4) | additional federal credit to residential access line (3) | \$0.58 |

APPROVED

DEC 19 2001

DIRECTOR OF

PUBLIC UTILITIES

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate. In no instance will a subscriber's monthly local exchange rate be less than \$2.50 after application of the Lifeline credits.
- (2) Lifeline Service has been certified by the FCC, therefore, eligible Lifeline customers will receive the appropriate waiver of the Subscriber Line Charge (SLC) as specified by the FCC.
- (3) Half of the amount specified on line 3, not to exceed \$1.75.

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

- E. Eligibility Requirements for Lifeline Service On Tribal Lands AT
1. The applicant or customer seeking to obtain Lifeline Service on Tribal Lands (see definition in 2.a. below) must demonstrate their current participation in at least one of the following assistance programs. The Applicant or customer shall complete and sign, under penalty of perjury, an authorization and self certification form provided by the Company. The Applicant or customer must check all of the following that apply.
 - a. Supplemental Nutritional Assistance Program ("SNAP" f/k/a Food Stamps)
 - b. Temporary Assistance for Needy Families (TANF)
 - c. Supplemental Security Income (SSI)
 - d. Medical Assistance (Medicaid/Soonercare) AT
 - e. Vocational Rehabilitation (including aid to the hearing impaired)
 - f. Oklahoma Sales Tax Relief
 - g. Federal Public Housing Assistance
 - h. Low Income Home Energy Assistance Program
 - i. Food Distribution Program on Indian Reservations ("FDPIR") AT
 - j. 135% of the Federal Poverty Guidelines AT
 - k.. Bureau of Indian Affairs general assistance; (1)
 - l.. Temporary Assistance for Needy Families (TANF) tribally-administered block grant programs; (2)
 - m. Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
 - n. National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals).
 2. The applicant or customer must also certify:
 - a. Residence on Tribal Lands as described in Title 25, Code of Federal Regulations, Section 20.1, paragraph (v).
 - b. Agreement to notify Company if applicant or customer no longer participates in the program or programs described in paragraph 1. above, for which the Applicant or Customer certified their participation in.
 - c. The applicant must not be a dependent for Federal Income Tax purposes, unless the applicant is over the age of 60.
 3. Upon receipt of the completed self certification, Company will begin providing the credit set forth in F. below. Lifeline credits will not be implemented or continued unless telephone service arrangements are and remain, within the Lifeline Service criteria specified above.
- (1) Applicant must "have sufficient resources to meet the basic and special needs defined by the Bureau Standard of assistance," 25 C.F.R. § 20.21.
- (2) 42 U.S.C. § 612 and 45 C.F.R. § 286.

Issued: 7-27-2012

Legal Authority: OAC 165:55-5-10(c) Effective: 8-1-2012

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LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

E. Eligibility Requirements for Lifeline Service On Tribal Lands (Continued) AT

4. The Lifeline credits will be discontinued upon receipt by the Company of notice by the Customer that they no longer meet the eligibility requirements for the Lifeline credits.
5. The Lifeline credits will be automatically discontinued unless the customer annually certifies they continue to meet the eligibility requirements for Lifeline credits. All such annual re-self certifications must be submitted to the Company within the time frames determined by the Company.
6. Lifeline customers will be converted to standard residential service rates once they no longer qualify for Lifeline Service. No service charge will apply for this change in service.

F. Lifeline Credits on Tribal Lands DT

Lifeline Service on Tribal Lands has been established by the Federal Communications Commission (FCC), therefore eligible Lifeline customers will receive the appropriate credits, depending on the programs the customer participates in, as specified by the FCC in its Twelfth Report and Order entered into in CC Docket No. 96-45 and as set forth below:

1. If a customer indicates eligibility to receive Lifeline credits as, Supplemental Nutritional Assistance Program ("SNAP" f/k/a Food Stamps), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), Medical Assistance, Vocational Rehabilitation (including aid to the hearing impaired), Food Distribution Program on Indian Reservations ("FDPIR") or Oklahoma Sales Tax Relief Act (68 O.S. §5011, et seq.), then the Customer should receive credits as follows:

	Monthly Credit ⁽¹⁾	
Federal Lifeline Credit:	\$9.25	CR
Oklahoma Universal Service Fund Credit:	\$1.17	CR

Additional Federal Credit to Residential Access Line
necessary to reduce customer's bill to \$1.00 (See footnote (2) below)

- (1) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate, less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.
- (2) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

Issued: 7-27-2012

Legal Authority: OAC 165:55-5-10(c) Effective: 8-1-2012

REDACTED-FOR PUBLIC INSPECTION

LOCAL EXCHANGE SERVICE

III. LIFELINE SERVICE

F. Lifeline Credits on Tribal Lands (Continued)

DT

2. If a customer indicates his eligibility to receive Lifeline credits as only one or more of the following: Federal Public Housing Assistance, Low Income Home Energy Assistance Program, Bureau of Indian Affairs general assistance, Temporary Assistance for Needy Families (TANF) tribally administered block grant programs, Head Start Programs (only those meeting its income qualifying eligibility provision), 135% of the Federal Poverty Guidelines or National School Lunch Program (only Applicant or customer who satisfy the income standard of the program for free meals), then the Customer should receive credits as follows:

AT

Monthly Credit ⁽³⁾

Federal Lifeline Credit:

\$9.25

CR

Additional Federal Credit to Residential Access Line

Necessary to reduce customer's bill to \$1.00 (See footnote (4) below)

DT

- (3) Credit amount will not exceed the total of the subscriber line charge and the residential local exchange rate less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.
- (4) Eligible customers will also receive an additional reduction off the applicable monthly tariff rate for their local exchange service, not to exceed \$25.00 as specified by the FCC in its Twelfth Report and Order entered in CC Docket No. 96-45.

Issued: 7-27-2012

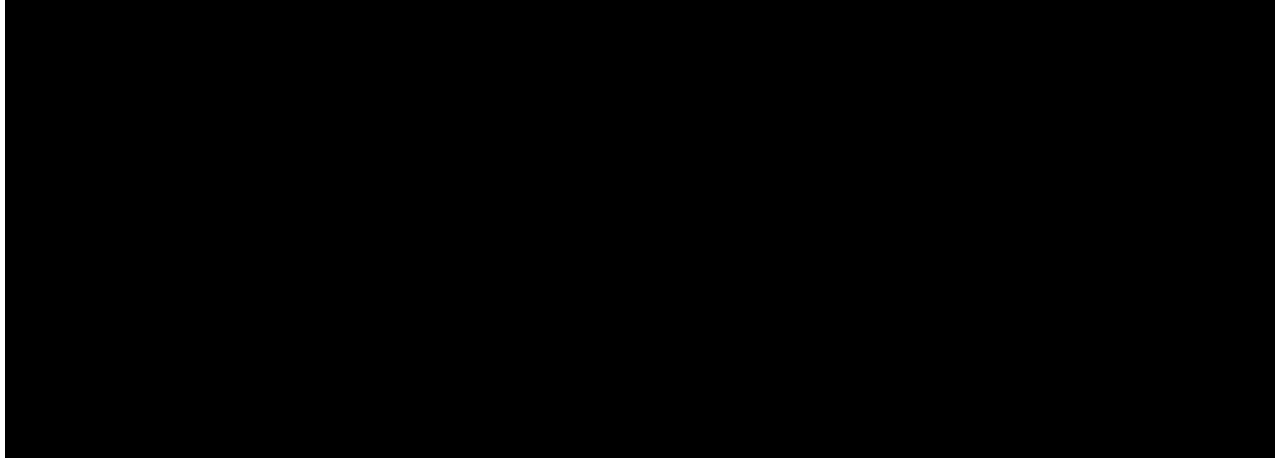
Legal Authority: OAC 165:55-5-10(c) Effective: 8-1-2012

REDACTED-FOR PUBLIC INSPECTION

Response to Line 3010B

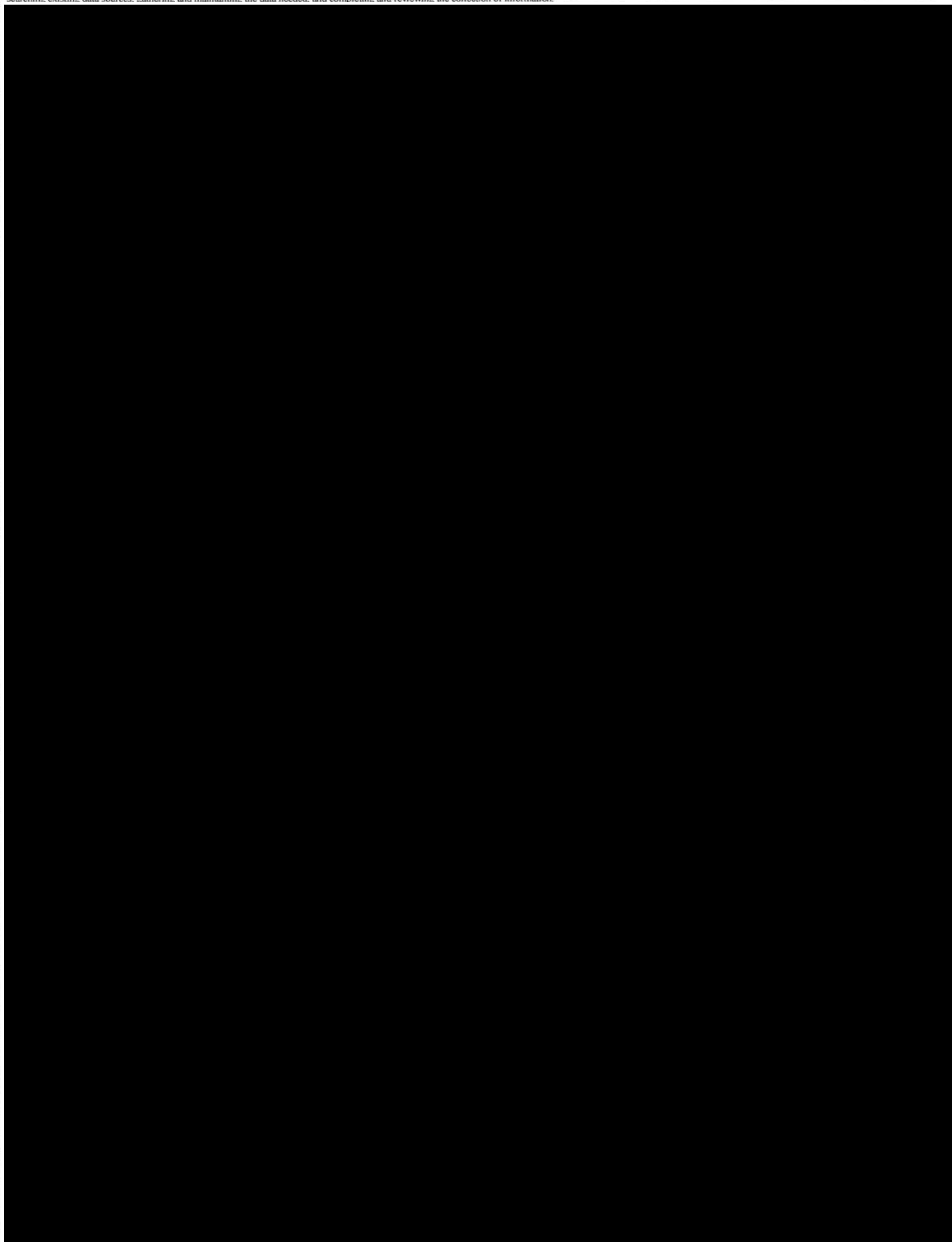
Terral Telephone Company

Study Area 432029

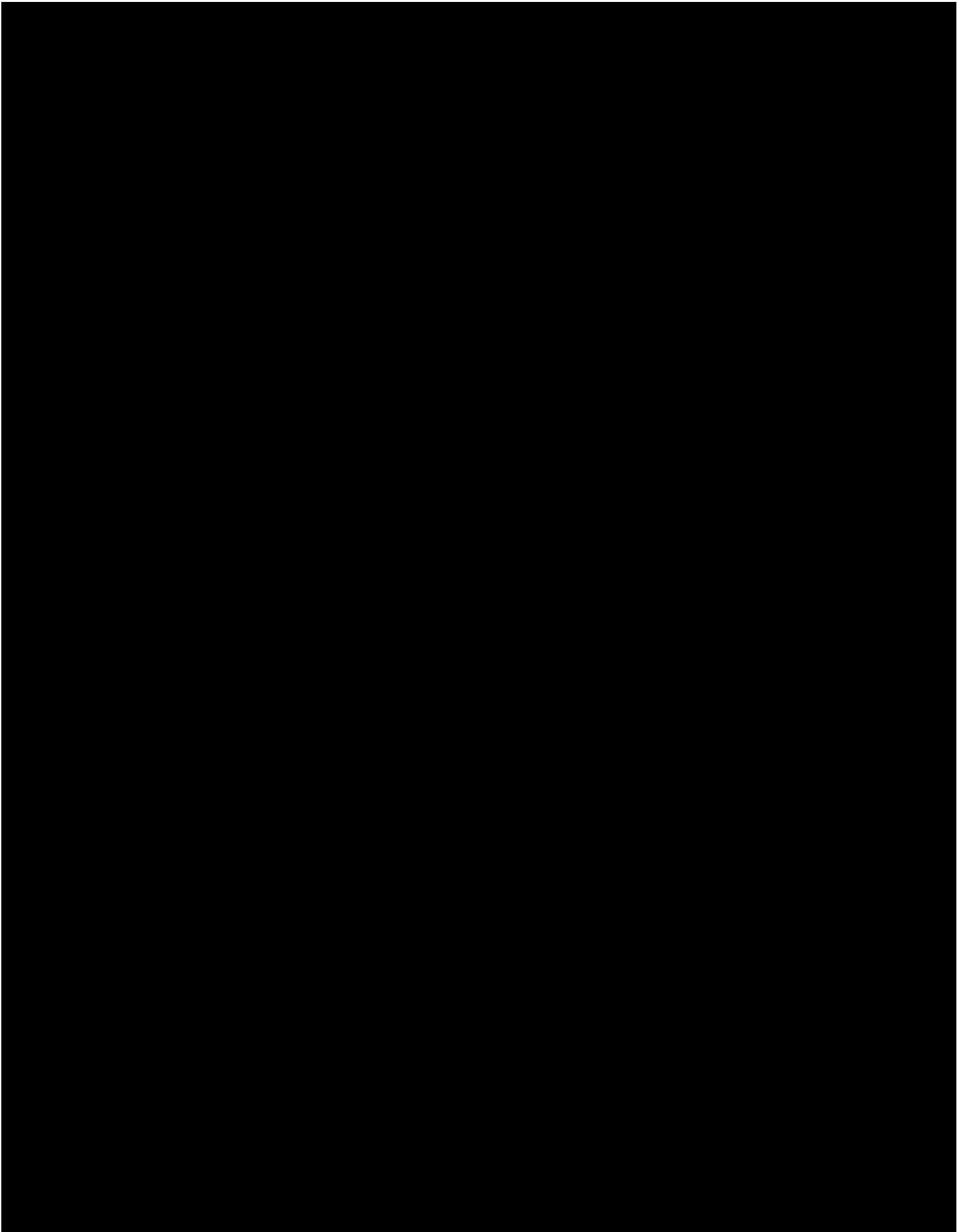


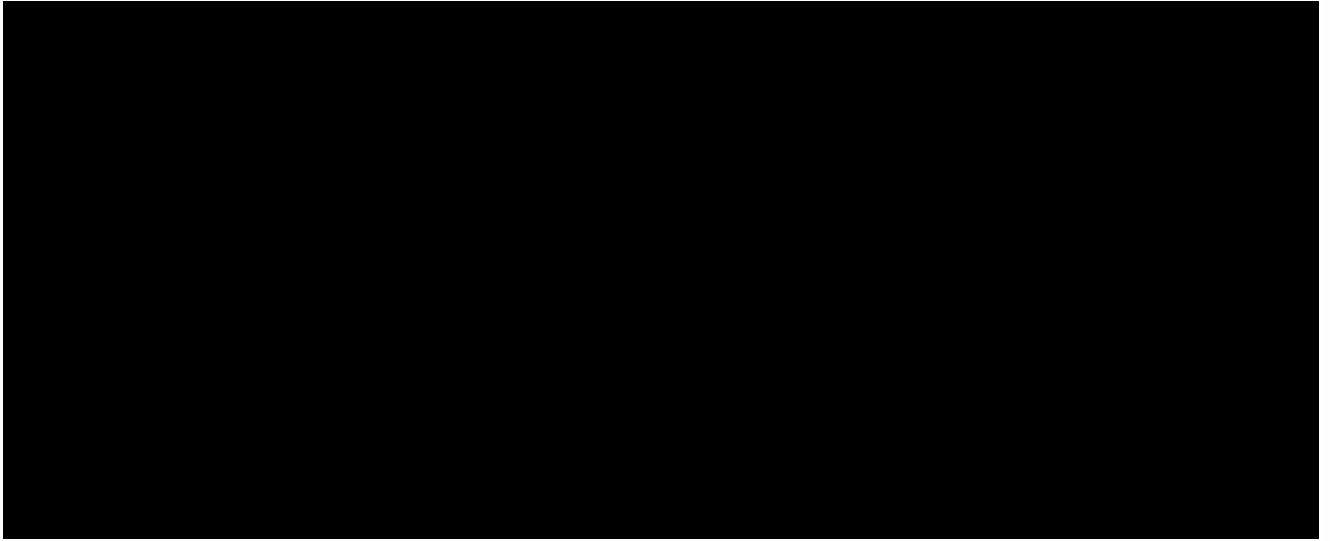
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According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.



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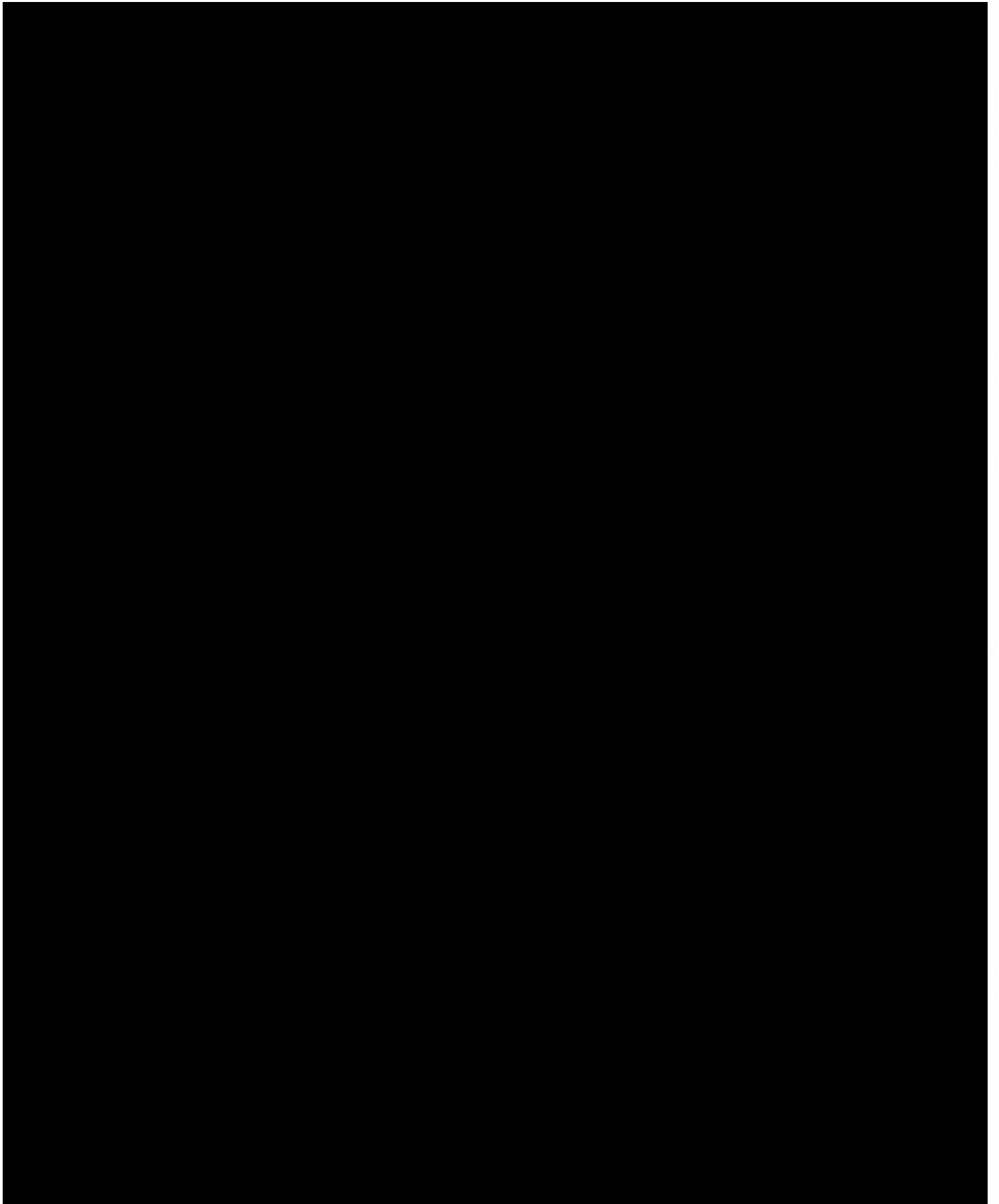
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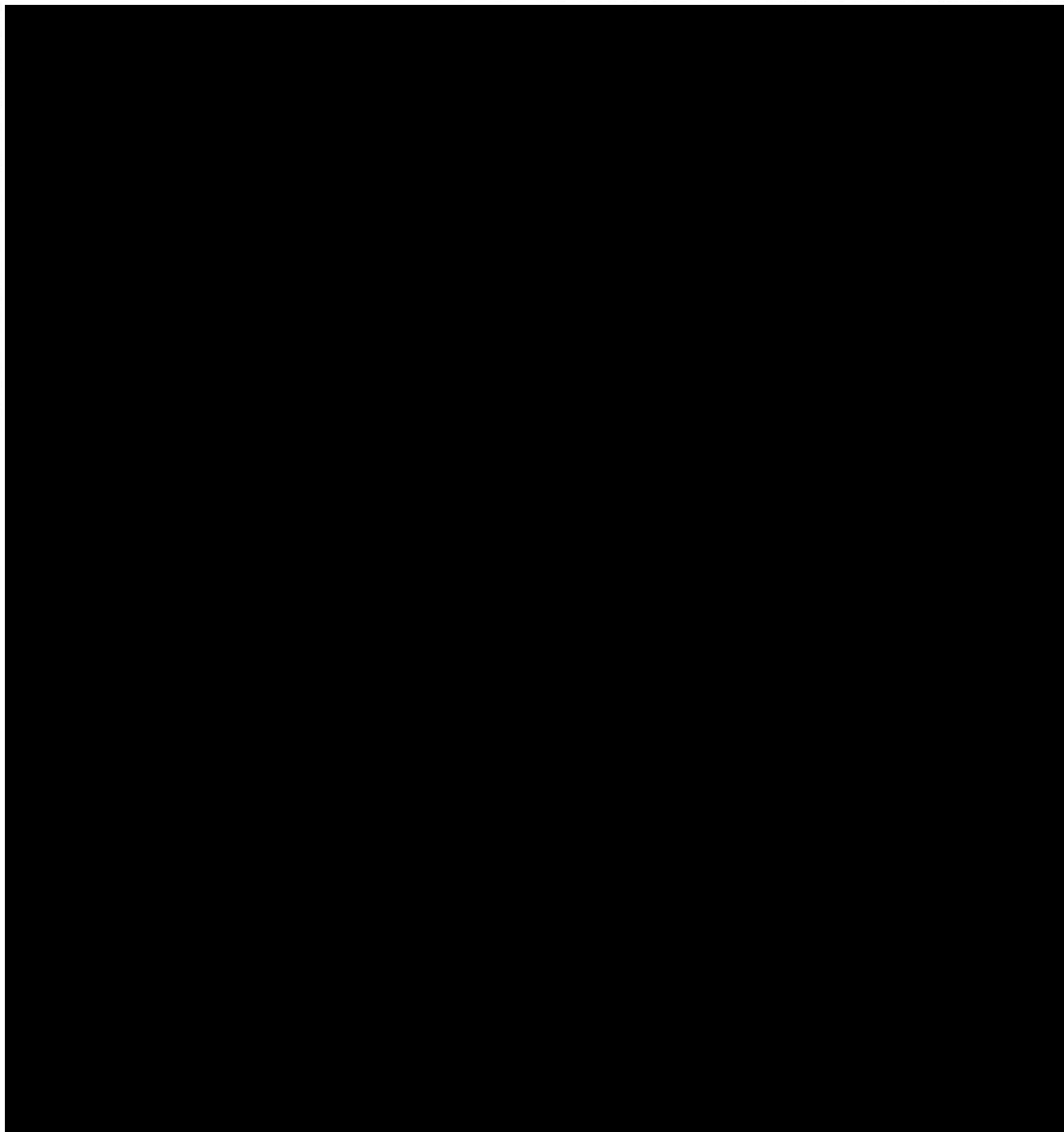
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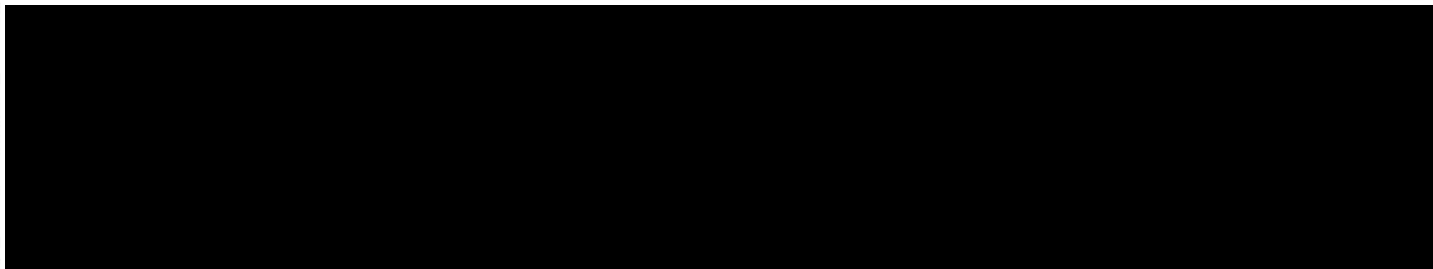
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